

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

M CORP DBA 11:59,)	
)	
<i>Plaintiff,</i>)	
)	
v.)	Case No. 1:24-cv-1823
)	
INFINITIVE, INC., et al.)	
)	
<i>Defendants.</i>)	
)	

**INFINITIVE INC.’S MOTION FOR LEAVE TO FILE
AMENDED ANSWER AND COUNTERCLAIMS**

Pursuant to Federal Rule of Procedure 15(a), Defendant Infinitive, Inc. (hereinafter “Infinitive” or the “Company”), by counsel, respectfully requests that this Court grant it leave to amend its Answer and Affirmative Defenses to include an additional defense and Counterclaims. A copy of the proposed Amended Answer and Counterclaims is attached as Exhibit A. A redline copy of the proposed Amended Answer and Counterclaims is attached as Exhibit B.

Infinitive certifies it made a good-faith effort to confer with the other parties prior to filing this Motion.

WHEREFORE, for the reasons set forth in the attached Memorandum in Support, Infinitive respectfully requests that this Court grant its Motion for Leave to File Amended Answer and Counterclaims, and award such other relief as is just and proper.

Dated: May 14, 2025

Respectfully submitted,

/s/ Micah E. Ticatch
Micah E. Ticatch, Va. Bar No. 83351
John W. H. Harding, Va. Bar No. 87602
ISLER DARE, P.C.

1945 Old Gallows Road. Suite 650
Vienna, Virginia 22182
Phone: (703) 748-2690
Facsimile: (703) 748-2695
mticatch@islerdare.com
jharding@islerdare.com
Counsel for Infinitive, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of May 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record.

/s/ Micah E. Ticatch
Micah E. Ticatch, Va. Bar No. 83351
ISLER DARE, P.C.
1945 Old Gallows Road. Suite 650
Vienna, Virginia 22182
Phone: (703) 748-2690
Facsimile: (703) 748-2695
mticatch@islerdare.com

Counsel for Infinitive, Inc.